

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

-against-

SEAN COMBS, JUSTIN DIOR COMBS, ETHIOPIA
HABTEMARIAM, LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM, CHALICE RECORDING
STUDIOS, LOVE RECORDS, MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP, COMBS GLOBAL
ENTERPRISES, JOHN and JANE DOES 1-10 and ABC
CORPORATIONS. 1-10,

Defendants.

Case No.: 24-cv-01457

**NOTICE OF MOTION TO
DISMISS THE FIRST
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in support of this Notice of Motion, the supporting Declaration of Donald S. Zakarin dated March 26, 2024, and the Declarations of Sir Lucian Grainge dated March 25, 2024, Martha Braithwaite dated March 25, 2024, and Ethiopia Habtemariam dated March 27, 2024 exhibited thereto and their respective exhibits, and all prior proceedings heretofore had and all papers filed herein, Defendants Sir Lucian Grainge, Motown Records and UMG Recordings, Inc., (the “UMG Defendants”) will move this Court, at a date and time to be determined by the Court, for Orders dismissing with prejudice all claims against them in plaintiff Rodney Jones’ (“Plaintiff”) Amended Complaint dated March 4, 2024, pursuant to Federal Rules of Civil Procedure 8, 12(b)(2) and 12(b)(6) and to strike impertinent and scandalous allegations in the Amended Complaint pursuant to Rule 12(f).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and memoranda shall be served within 14 days hereof, and any reply papers shall be served within 7 days after service of the answering papers.

Dated: New York, New York
March 27, 2024

PRYOR CASHMAN LLP

By: 

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